

**EXHIBIT 2**  
**Redacted Version of**  
**Document Filed Under**  
**Seal**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
WAYMO LLC, )  
Plaintiff, )  
vs. ) Case No.  
UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
Defendants. )  
\_\_\_\_\_)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DANIEL CHU

San Francisco, California

Monday, April 3, 2017

Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2583707

PAGES 1 - 53

Page 1

1 prepared before it went to senior management; would  
2 that be fair?

3 MS. BAILY: Object to form.

4 THE WITNESS: That's fair, yes.

5 BY MR. GONZALEZ: 10:18:33

6 Q You don't recall making any edit to the big  
7 headline that said [REDACTED]

8 [REDACTED] You -- you did not change  
9 that in any way, did you?

10 MS. BAILY: Object to form. 10:18:43

11 THE WITNESS: I don't remember, honestly.

12 But I think it's important context to know that many  
13 of these documents are intended to provoke  
14 conversation and thought, not necessarily saying  
15 this is the answer. 10:18:52

16 BY MR. GONZALEZ:

17 Q Fair enough.

18 Then if you turn to the next page, it says  
19 that [REDACTED]

20 [REDACTED] 10:19:04

21 Do you see that?

22 A I do.

23 Q What does that mean? [REDACTED]

24 [REDACTED]

25 [REDACTED] 10:19:12

Page 21